

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

M.A. HANNA PLASTICS GROUP, INC.,
WILMINGTON ECONOMIC
DEVELOPMENT CORPORATION
AND SIDNEY AND CAROL MAFFETT,

Defendants.

CIVIL ACTION 06-409-GMS

**NOTICE OF RULE 30(b)(6) DEPOSITION
OF WILMINGTON ECONOMIC DEVELOPMENT CORPORATION**

TO: Robert W. Whetzel, Esquire
Todd Anthony Coomes, Esquire
Richards, Layton & Finger
One Rodney Square
P.O. Box 551
Wilmington, DE 19899

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and Local Rule 30.1 of the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware, the Defendant, M.A. Hanna, by and through its undersigned counsel, will take the deposition of the **Corporate Designee(s) of Wilmington Economic Development Corporation ("WEDCO")**, with knowledge of the subject matters listed below on Thursday, October 11, 2007 at 10:00 AM and Friday, October 12, 2007 at 10:00 AM, at the offices of Weir & Partners, LLP, 824 Market Street Mall, Suite 1001, Wilmington,

Delaware 19899, before a Notary Public or some other officer authorized by law to administer oaths. The oral examination will continue from day to day until completed.

MATTERS ON WHICH EXAMINATION IS REQUESTED

1. Allegations set forth in Court I of Wilmington Economic Development (“WEDCO”) Cross-Claims that M.A. Hanna is liable for and is required to pay an equitable share of any response costs or other monetary liability or damage of any kind incurred and to be incurred by WEDCO relating to the Site pursuant to §113(f) of CERCLA.
2. Allegations set forth in Court III of WEDCO’s Cross-Claims that Dayco breached its contract with WEDCO.
3. Allegations set forth in Court V of WEDCO’s Cross-Claims that Dayco committed fraud.
4. Activities at the Site, including dumping, disposal, storage of materials and equipment during the time frame that WEDCO owned the property.

WEIR & PARTNERS LLP

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And

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Attorneys for Defendant, M.A. Hanna
Plastics Group, Inc.

Dated: September 4, 2007